

In The Matter Of:

*Sanitec West, et al. v.
Joseph Delloiacovo, et al.*

*Jeffrey Weinstein
Vol. 2, January 27, 2003*

*Mehler & Hagestrom
Court Reporters
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[1] IN THE UNITED STATES DISTRICT COURT
[2] NORTHERN DISTRICT OF OHIO - EASTERN DIVISION
[3] SANITEC WEST, et al.,
[4] Plaintiffs,

JUDGE NUGENT
[5] -vs- NO. 1-02-01582-DCN
VOLUME II

[6] JOSEPH DELLOIACOVO,
et al.,

[7] Defendants.

[8]
[9]
[10] Continued deposition of JEFFREY WEINSTEN,
[11] taken as if upon cross-examination before Pamela
[12] S. Greenfield, a Registered Diplomat Reporter,
[13] Certified Realtime Reporter and Notary Public
[14] within and for the State of Ohio, at the offices
[15] of Walter & Haverfield, 1300 Terminal Tower,
[16] Cleveland, Ohio, at 5:22 p.m. on Monday, January
[17] 27, 2003, pursuant to notice and/or stipulations
[18] of counsel, on behalf of the Defendants in this
[19] cause.

[20]
[21] MEHLER & HAGESTROM
Court Reporters

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[20] ALSO PRESENT:

[21] Joseph Delloiacovo

[22]

[23]

[24]

[25]

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(1) JEFFREY WEINSTEIN, of lawful age, called
(2) by the Defendants for the purpose of
(3) cross-examination, as provided by the Rules of
(4) Civil Procedure, being by me first duly sworn, as
(5) hereinafter certified, deposed and said as
(6) follows:
(7) **CONTINUED CROSS-EXAMINATION OF JEFFREY WEINSTEIN**
(8) **BY MR. WALSH:**
(9) **Q:** Good afternoon, Mr. Weinstein. We meet once again
(10) in Ohio instead of Delaware.
(11) We will treat this as a continuation of your
(12) earlier deposition if that's okay with you and
(13) your counsel.
(14) **MS. SMITH:** That's fine.
(15) **Q:** Okay. Mr. Weinstein, have there been any changes
(16) in the ownership of Sanitec, Limited since we
(17) last spoke?
(18) **A:** No.
(19) **Q:** So as of today, Mr. Quinn still owns
(20) approximately 52 percent of Sanitec Worldwide and
(21) you own the minority interest in Sanitec
(22) Worldwide?
(23) **A:** No. Windsor Holdings owns 51 percent of Sanitec
(24) Worldwide and Salem Associates owns 49 percent of
(25) Sanitec Worldwide, Sanitec Worldwide.

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(1) **Q:** And as far as you know, Mr. Quinn owns Windsor
(2) Holdings; is that correct?
(3) **A:** I don't know that.
(4) **Q:** You believe that to be the case, though?
(5) **A:** No. Mr. Quinn has just, he speaks on behalf of
(6) Windsor Holdings but I don't know who owns
(7) Windsor Holdings.
(8) **Q:** Have you since acquired any other interest in any
(9) Sanitec company, since we last spoke?
(10) **A:** No.
(11) **Q:** Did you review any documents or meet with anybody
(12) in preparation for your deposition this
(13) afternoon?
(14) **A:** My attorneys.
(15) **Q:** Did you meet with anybody outside the presence of
(16) your attorneys?
(17) **A:** No.
(18) **Q:** Did you review any documents?
(19) **A:** I believe I went over some of the documents
(20) relating to the distribution agreement between
(21) Sanitec, Limited and Sanitec West.
(22) **Q:** Did you review any other documents besides those?
(23) **A:** I did have an opportunity to scan some of the
(24) documents that were provided by Mr. Climaco's law
(25) firm in a couple of notebooks.